

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

|                              |   |                         |
|------------------------------|---|-------------------------|
| UNITED THERAPEUTICS          | ) |                         |
| CORPORATION,                 | ) |                         |
|                              | ) |                         |
| Plaintiff,                   | ) |                         |
|                              | ) |                         |
| v.                           | ) | C.A. No. 23-975-RGA-SRF |
|                              | ) |                         |
| LIQUIDIA TECHNOLOGIES, INC., | ) |                         |
|                              | ) |                         |
| Defendant.                   | ) |                         |

**JOINT MOTION FOR TELECONFERENCE TO RESOLVE DISCOVERY DISPUTE**

Plaintiff United Therapeutics Corporation and Defendant Liquidia Technologies, Inc. respectfully move this Court to schedule a teleconference to address some additional outstanding disputes regarding the following discovery matters:

- **Liquidia's refusal to produce financial documentation responsive to UTC's Requests for Production Nos. 11-15**
- **Liquidia's request for a one month extension of the fact discovery deadline.**
- **UTC's refusal to collect documents from and provide a deposition of Dr. Rothblatt.**
- **UTC's refusal to respond to Interrogatories No. 4 and 5.**

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in a verbal meet-and-confer by telephone on October 1, 2024.

- Plaintiff:  
Delaware Counsel: Michael J. Flynn (Morris, Nichols, Arsht & Tunnell LLP)  
Lead Counsel: Art Dykhuis and Katherine Pappas (McDermott, Will & Emery LLP)
- Defendant:  
Delaware Counsel: Karen E. Keller (Shaw Keller LLP)  
Lead Counsel: Robert Minn (Cooley LLP)

The parties respectfully request that these disputes be heard at the discovery conference currently set for October 24, 2024. *See* D.I. 132.

SHAW KELLER LLP

/s/ Karen E. Keller

Karen E. Keller (No. 4489)  
Nathan R. Hoeschen (No. 6232)  
I.M. Pei Building  
1105 North Market Street, 12th Floor  
Wilmington, DE 19801  
(302) 298-0700  
kkeller@shawkeller.com  
nhoeschen@shawkeller.com  
*Attorneys for Defendant*

October 17, 2024

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Michael J. Flynn

Michael J. Flynn (No. 5333)  
1201 North Market Street  
P.O. Box 1347  
Wilmington, DE 19899  
(302) 658-9200  
mflynn@morrisnichols.com  
*Attorneys for Plaintiff*